

Mr. Doug Jaques
Janco Products, Inc.
920 South Logan St.
Mishawaka, IN 46544

Re: **141-13575**
First Administrative Amendment to
Part 70 T 141-7550-00129

Dear Mr. Jaques:

Janco Products, Inc. was issued a Part 70 Operating Permit on February 1, 2000 for the fiberglass reinforced tube manufacturing source. A Minor Permit Modification (141-12313) was issued on August 25, 2000. A letter requesting changes to this permit was received on December 6, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

The source is constructing three (3) dual stream pultrusion machines. These pultrusion machines do not require a source modification pursuant to 326 IAC 2-7-10.5 (Source Modification) because the potential to emit VOC is less than 10 tons per year and there is no control equipment required for VOC emissions in order for the source to comply with a rule. The potential to emit each individual HAP is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year. The pultrusion machines do not qualify as insignificant activities because the potential to emit of each individual HAP is greater than 2.5 tons per year. See pages 1 through 3 of 3 of Appendix A of this document for detailed emissions calculations.

The source is also constructing the following insignificant emission units, which will not be listed in the Part 70 Operating Permit because they have no applicable rules:

- (a) Four (4) natural gas fired cure ovens, identified as JANOV-001, JANOV-002, JANOV-003, and JANOV-004, capacity: 0.35 million British thermal units per hour, each.
- (b) Three (3) strand winder units with no quantifiable emissions, identified as Janco W-001, W-002, and W-003, capacity: 30 pounds of fiberglass tubes per hour, each.

The Part 70 Operating permit is being modified through a Part 70 Administrative Amendment. This modification is being performed pursuant to 326 IAC 2-7-11(a)(8), which states, "An administrative permit amendment is a Part 70 permit revision that revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term." Since the only rule applicable to the facilities in this modification is 326 IAC 6-1-2, Nonattainment Area Particulate Limitations, which is applicable to all facilities at this source, there are no new applicable rules as a result of this modification.

The changes to the Part 70 Operating Permit are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) single stream pulltrusion machine, identified as Janco 45-S, installed in 1997, exhausting to stack P1, capacity: 7.28 pounds of resin per hour.
- (b) One (1) single stream pulltrusion machine, identified as Janco 46-S, installed in 1997, exhausting to stack P1, capacity: 26.95 pounds of resin per hour.
- (c) One (1) single stream pulltrusion machine, identified as Janco 48-S, installed in 1997, exhausting to stack P1, capacity: 7.28 pounds per hour.
- (d) One (1) single stream pulltrusion machine, identified as Janco 44-S, installed in 1999, exhausting to stack P1, capacity: 9.114 pounds per hour.
- (e) One (1) dual stream pulltrusion machine, identified as Janco 50-D-A and Janco 50-D-B, installed in 1998, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (f) One (1) single stream pulltrusion machine, identified as Janco 32-S, installed in 1996, exhausting to stack P1, capacity: 8.07 pounds per hour.
- (g) One (1) single stream pulltrusion machine, identified as Janco 34-S, installed in 1996, exhausting to stack P1, capacity: 6.07 pounds per hour.
- (h) One (1) single stream pulltrusion machine, identified as Janco 36-S, installed in 1996, exhausting to stack P1, capacity: 23.16 pounds per hour.
- (i) One (1) single stream pulltrusion machine, identified as Janco 38-S, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (j) One (1) dual stream pulltrusion machine, identified as Janco 40-D-A and Janco 40-D-B, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (k) One (1) dual stream pulltrusion machine, identified as Janco 42-D-A and Janco 42-D-B, installed in 1996, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (l) One (1) resin mix room, identified as Janco MA-001, constructed in 1997 and exhausting to stack P1.
- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLV) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2)

high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.

- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- (p) One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.
- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the pultrusion operations shall be limited to 0.03 grain per dry standard cubic foot.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential to emit VOC to twenty-five (25) tons per year from the three (3) pultrusion machines (based on 7% monomer flash off for a non-vapor suppressed (NVS) resin) shall cause the facilities to become subject to 326 IAC 8-1-6 and shall require prior approval.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Ortolani, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-

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Mishawaka, Indiana

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691-3395).

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Mishawaka, Indiana

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Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

CAO/MES

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Janco Products, Inc.
920 South Logan Street
Mishawaka, Indiana 46544**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---------------------------------|
| Operation Permit No.: T 141-7550-00129 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: February 1, 2000 |

First Minor Permit Modification, 141-12313-00129, issued on August 25, 2000

| | |
|---|-------------------------------|
| First Administrative Amendment No. 141-13575-00129 | Pages affected: 4, 6, and 37a |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

| | | |
|------------|--|------------|
| | Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| | D.2.10 Record Keeping Requirements | |
| | D.2.11 Reporting Requirements | |
| D.3 | FACILITY OPERATION CONDITIONS - Insignificant Activities | 35 |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| | D.3.1 Particulate Matter (PM) [326 IAC 6-1-2] | |
| | D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5] | |
| | Compliance Determination Requirements | |
| | D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] | |
| D.4 | FACILITY OPERATION CONDITIONS - Three (3) pultrusion machines | 37a |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| | D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)] | |
| | D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] | |
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exhausting to stack P1, capacity: 1.0 pound per hour.

- (j) One (1) dual stream pulltrusion machine, identified as Janco 40-D-A and Janco 40-D-B, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (k) One (1) dual stream pulltrusion machine, identified as Janco 42-D-A and Janco 42-D-B, installed in 1996, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (l) One (1) resin mix room, identified as Janco MA-001, constructed in 1997 and exhausting to stack P1.
- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.
- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- (p) One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.
- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) 0.526 million British thermal units Boiler Natural Gas (Janco SV-56), installed in 1989. [326 IAC 6-1-2] [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. One (1) cold degreaser with a solvent usage of 0.048 pounds per hour, installed in 1991. No halogenated solvents are used in this degreaser. [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors,

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the pultrusion operations shall be limited to 0.03 grain per dry standard cubic foot.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential to emit VOC to twenty-five (25) tons per year from the three (3) pultrusion machines (based on 7% monomer flash off for a non-vapor suppressed (NVS) resin) shall cause the facilities to become subject to 326 IAC 8-1-6 and shall require prior approval.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Permit Modification

Source Background and Description

| | |
|--|---|
| Source Name: | Janco Products, Inc. |
| Source Location: | 920 South Logan St., Mishawaka, IN 46544 |
| County: | St. Joseph |
| SIC Code: | 3089 |
| Operation Permit No.: | T 141-7550-00129 |
| Operation Permit Issuance Date: | February 1, 2000 |
| Minor Permit Modification No.: | 141-13575-00129 |
| Permit Reviewer: | CarrieAnn Ortolani/ MES |

The Office of Air Management (OAM) has reviewed a modification application from Janco Composites, Inc. relating to the construction of the following emission units and pollution control devices:

The source is constructing the follow significant emission units:

Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.

The source is also constructing the following insignificant emission units:

Four (4) natural gas fired cure ovens, identified as JANOV-001, JANOV-002, JANOV-003, and JANOV-004, capacity: 0.35 million British thermal units per hour, each.

The following units will not have any quantifiable emissions:

Three (3) strand winder units, identified as Janco W-001, W-002, and W-003, capacity: 30 pounds of fiberglass tubes per hour, each.

History

On December 6, 2000, Janco Products, Inc. submitted an application to the OAM requesting to add additional pultrusion operations, curing ovens and strand winders to their existing plant. Janco Products, Inc. was issued a Part 70 permit on February 1, 2000. A first Minor Permit Modification (141-12313) was issued on August 25, 2000.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 6, 2000. Additional information was received on December 29, 2000.

Emission Calculations

See pages 1 through 3 of 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|------------------|----------------------------------|
| PM | 0.012 |
| PM ₁₀ | 0.047 |
| SO ₂ | 0.004 |
| VOC | 9.24 |
| CO | 0.515 |
| NO _x | 0.613 |

| HAP's | Potential To Emit (tons/year) |
|-----------------|----------------------------------|
| Benzene | 1.29E-5 |
| Dichlorobenzene | 7.36E-6 |
| Formaldehyde | 4.60E-4 |
| Hexane | 1.10E-2 |
| Toluene | 2.09E-5 |
| Lead | 3.07E-6 |
| Cadmium | 6.75E-6 |

| HAP's | Potential To Emit (tons/year) |
|-----------|----------------------------------|
| Chromium | 8.59E-6 |
| Manganese | 2.33E-6 |
| Nickel | 1.29E-5 |
| Styrene | 7.85 |
| TOTAL | 7.86 |

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12, which states that a Part 70 permit modification is any revision to a Part 70 permit that cannot be accomplished under the program's provisions for administrative permit amendments under section 11 of this rule. Since the source is adding new equipment which has it's own applicable conditions, the modification cannot be accomplished through an administrative amendment. The modification is a minor permit modification pursuant to 326 IAC 2-7-12(b), which states that minor permit modification procedures may be used only for those permit modifications that do not violate any applicable requirement; do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit; do not require or change a case-by-case determination of an emission limit or other standard, source specific determination for temporary sources of ambient impacts, or visibility or increment analysis; do not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject; are not modifications under any provision of Title I of the CAA; and are not required by the Part 70 program to be processed as a significant modification.

This modification does not require a source modification pursuant to 326 IAC 2-7-10.5 (Source Modification) because the potential to emit VOC is less than 10 tons per year and there is no control equipment required for VOC emissions in order for the source to comply with a rule. The potential to emit each individual HAP is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year. The pultrusion facilities do not qualify as insignificant activities because the potential to emit of each individual HAP is greater than 2.5 tons per year.

County Attainment Status

The source is located in St. Joseph County.

| Pollutant | Status |
|------------------|------------|
| PM ₁₀ | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Janco Products, Inc.
Mishiwaka, Indiana
Permit Reviewer: MES

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- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. With the exception of South Bend which is maintenance for ozone, St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|------------------|--------------------------|
| PM | 19.6 |
| PM ₁₀ | 19.6 |
| SO ₂ | 5.00 |
| VOC | 68.3 |
| CO | 5.00 |
| NO _x | 10.0 |

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the limited potential to emit table from the Technical Support Document to T141-7550-00129, issued on February 1, 2000 and the potential to emit table in the Minor Permit Modification, 141-12313-00129, issued on August 25, 2000.

Potential to Emit of Source After Construction of the Modification

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

| | Potential to Emit (tons/year) | | | | | | |
|------------------|----------------------------------|------------------|-----------------|------|-------|-----------------|------|
| Process/facility | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Modification | 0.012 | 0.047 | 0.004 | 9.24 | 0.515 | 0.613 | 7.86 |
| Existing Source | 19.6 | 19.6 | 5.00 | 68.3 | 5.00 | 10.0 | 55.8 |
| Total | 19.6 | 19.6 | 5.00 | 77.5 | 5.52 | 10.6 | 63.7 |

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This modification to an existing minor stationary source will not make the source a major source pursuant to 326 IAC 2-2 and 40 CFR 52.21, PSD, because the total source potential to emit of each criteria pollutant is less than 250 tons per year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 326 IAC 20; 40 CFR Part 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit each individual HAP from the three (3) proposed pultrusion machines is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-1 (Particulate Rules)

This source is located in St. Joseph County, which is listed in 326 IAC 6-1-7. This source is not specifically listed in 326 IAC 6-1-18. Since the source has a potential to emit PM greater than 100 tons per year, the requirements of 326 IAC 6-1-2 are applicable to all facilities at this source. Each of the three (3) proposed pultrusion machines shall not discharge to the atmosphere any gases which contain PM in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)). Since the pultrusion machines have negligible PM emissions, the pultrusion machines will comply with this rule.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Since the potential to emit VOC from the three (3) proposed dual stream pultrusion machines is less than 25 tons per year, and the three (3) proposed pultrusion machines do not operate in series with the existing pultrusion machines, the requirements of 326 IAC 8-1-6 are not applicable.

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Mishiwaka, Indiana
Permit Reviewer: MES

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Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

There are no monitoring requirements applicable to this modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) single stream pulltrusion machine, identified as Janco 45-S, installed in 1997, exhausting to stack P1, capacity: 7.28 pounds of resin per hour.
- (b) One (1) single stream pulltrusion machine, identified as Janco 46-S, installed in 1997, exhausting to stack P1, capacity: 26.95 pounds of resin per hour.
- (c) One (1) single stream pulltrusion machine, identified as Janco 48-S, installed in 1997, exhausting to stack P1, capacity: 7.28 pounds per hour.
- (d) One (1) single stream pulltrusion machine, identified as Janco 44-S, installed in 1999, exhausting to stack P1, capacity: 9.114 pounds per hour.
- (e) One (1) dual stream pulltrusion machine, identified as Janco 50-D-A and Janco 50-D-B, installed in 1998, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (f) One (1) single stream pulltrusion machine, identified as Janco 32-S, installed in 1996, exhausting to stack P1, capacity: 8.07 pounds per hour.
- (g) One (1) single stream pulltrusion machine, identified as Janco 34-S, installed in 1996,

exhausting to stack P1, capacity: 6.07 pounds per hour.

- (h) One (1) single stream pulltrusion machine, identified as Janco 36-S, installed in 1996, exhausting to stack P1, capacity: 23.16 pounds per hour.
- (i) One (1) single stream pulltrusion machine, identified as Janco 38-S, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (j) One (1) dual stream pulltrusion machine, identified as Janco 40-D-A and Janco 40-D-B, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (k) One (1) dual stream pulltrusion machine, identified as Janco 42-D-A and Janco 42-D-B, installed in 1996, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (l) One (1) resin mix room, identified as Janco MA-001, constructed in 1997 and exhausting to stack P1.
- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.
- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- (p) One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.
- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.**

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (q) Three (3) dual stream pultrusion machines, identified as Janco 52 D-A /52 D-B, Janco 54 D-A/54 D-B, and Janco 56D-A/56D-B, exhausting to stack P1, capacity: 30 pounds of fiberglass tubes per hour, each.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the pultrusion operations shall be limited to 0.03 grain per dry standard cubic foot.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential to emit VOC to twenty-five (25) tons per year from the three (3) pultrusion machines (based on 7% monomer flash off for a non-vapor suppressed (NVS) resin) shall cause the facilities to become subject to 326 IAC 8-1-6 and shall require prior approval.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 141-13575-00129.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Four (4) Drying Ovens**

Page 1 of 3 App A

**Company Name: Janco Products, Inc.
Address City IN Zip: 950 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit: 141-7550-00129
Administrative Amendment: 141-13575
Reviewer: CarrieAnn Ortolani
Date: December 6, 2000**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.40

12.26

| Pollutant | | | | | | |
|-------------------------------|-------|-------|-------|-------------|-------|-------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.012 | 0.047 | 0.004 | 0.613 | 0.034 | 0.515 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Page 2 of 3 App A

Natural Gas Combustion Only**MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions**

Company Name: Janco Products, Inc.
Address City IN Zip: 950 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit: 141-7550-00129
Administrative Amendment: 141-13575
Reviewer: CarrieAnn Ortolani
Date: December 6, 2000

HAPs - Organics

| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Potential Emission in tons/yr | 1.288E-05 | 7.358E-06 | 4.599E-04 | 1.104E-02 | 2.085E-05 |

HAPs - Metals

| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Potential Emission in tons/yr | 3.066E-06 | 6.745E-06 | 8.585E-06 | 2.330E-06 | 1.288E-05 |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Emissions Calculations

| Material | Density (lb/gal) | Weight % Monomer VOC | Gallons per unit | Units per hour | Pounds VOC per hour | Pounds VOC per day | Tons of VOC per Year | PM tons per year | Flash Off Factor (%) | Transfer Efficiency |
|---------------------|-------------------------|----------------------------|----------------------------------|-------------------|------------------------|-----------------------|-------------------------|---------------------|----------------------------|------------------------|
| Cor 30 DP-202 Resin | 9.41 | 50.0% | 0.0605 | 90.0000 | 1.79 | 43.04 | 7.85 | 0.00 | 7.00% | 100.00% |
| Lupersol | 7.66 | 91.5% | 0.0061 | 90.0000 | 0.269 | 6.46 | 1.18 | 0.00 | 7.00% | 100.00% |
| Zelec un Lubricant | 8.16 | 4.0% | 0.0200 | 90.0000 | 0.041 | 0.99 | 0.18 | 0.00 | 7.00% | 100.00% |
| ASP 400 P Clay | 24.99 | 0.0% | 0.1600 | 90.0000 | 0.000 | 0.00 | 0.00 | 0.00 | 7.00% | 100.00% |
| Perkadox 16 | 9.41 | 0.0% | 0.0200 | 90.0000 | 0.000 | 0.00 | 0.00 | 0.00 | 7.00% | 100.00% |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | Potential Before Controls | | 2.10 | 50.5 | 9.21 | 0.00 | | |
| | | | Potential After Controls | | 2.10 | 50.5 | 9.21 | 0.00 | | |

| | |
|-------------------|------|
| Styrene Emissions | 7.85 |
|-------------------|------|

METHODOLOGY

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight Percent Volatile * Flash Off Factor

Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Weight Percent Volatile * Flash Off Factor

Potential VOC Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Weight Percent Volatile * Flash Off Factor

$$\text{Particulate Potential Tons per Year} = (\text{units/hour}) * (\text{gal/unit}) * (\text{lbs/gal}) * (1 - \text{Weight \% Volatiles}) * (1 - \text{Transfer efficiency}) * (8760 \text{ hr/yr}) * (1 \text{ ton} / 2000 \text{ lbs})$$

Total = Sum of all worst case coatings and solvents used

Flash Off Factor (%) is from Table 4.4-2 of AP-42